

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MINNESOTA

---

Amy Nasers,

Case Number: 0:12-03075-JRT/SER

Plaintiff,

vs.

**MOTION TO ENFORCE  
SETTLEMENT AGREEMENT**

Independent School District #384 and  
Annette Sallman, individually,

Defendants.

---

**MOTION**

Defendants Independent School District #384 (“District”) and Annette Sallman, individually, move the Court to enter an order and judgment ruling that the parties have entered into a binding settlement agreement and enforcing that agreement on the following terms:

1. Plaintiff Amy Nasers releases all claims she may have against Defendants, their officers, agents, employees and insurer, arising from the District’s termination of Nasers’ employment, including without limitation, any and all claims that were or could have been brought in this action.
2. Defendant District releases all claims it may have against Plaintiff Nasers for reimbursement of any alleged overpayments the District made to Nasers while she was an employee.
3. The Complaint (Doc. #1) is dismissed on the merits and with prejudice.

This motion is based on all the files, records, and proceedings herein, including the memorandum of law and affidavit of counsel filed contemporaneously herewith.

Dated: September 30, 2013

KENNEDY & GRAVEN, CHARTERED

By: /s/ Peter G. Mikhail

Maggie R. Wallner (#193458)

Peter G. Mikhail (#249907)

470 US Bank Plaza, 200 South Sixth Street

Minneapolis, MN 55402

(612) 337-9300

*Attorneys for Defendants ISD #384 and  
Annette Sallman*